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March 13, 2025

VIA ECF

The Honorable Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: Crocs, Inc. et al v. Jinjiang HobiBear Shoes & Clothing Co., Ltd.
1:25-cv-00180-JMF

Dear Judge Furman:

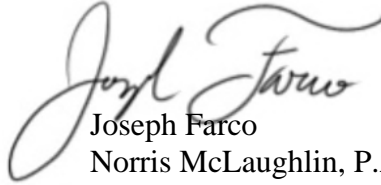
The undersigned writes on behalf of Defendant Jinjiang HobiBear Shoes & Clothing Co., Ltd. (“Hobi”) in the above-captioned action. The undersigned was only recently retained by Hobi to represent it in this case.

On behalf of Hobi and in accordance with Your Honor’s Individual Rule 2.D, the undersigned respectfully submits this letter-motion seeking an extension of time from the March 14, 2025 due date set forth in this Court’s Order (ECF Dkt. No. 19) for Hobi to answer or otherwise respond to the Complaint filed by plaintiffs Crocs, Inc. and Jibbitz, Inc. (“Plaintiffs”). Should the extension be granted, counsel for Hobi and Plaintiffs have agreed that the due date for Hobi’s response to the Complaint would now be Friday, April 18, 2025. Counsel for Plaintiff and Hobi have further conferred on adjournment of the Initial Pretrial Conference (ECF Dkt. No. 13) from April 10, 2025 to a date that is thirty (30) days after the answer or other response to the Complaint. Hobi has not made any previous requests for an extension of time nor have any such previous requests been granted or denied. The reason for this extension was Hobi’s recent retention of the undersigned and the undersigned’s previously scheduled events in the first week of April involving him to be located out of the country.

Pursuant to Your Honor’s Individual Rule 2.D, I have conferred with counsel for Plaintiffs concerning this request. On March 13, 2025, counsel for Plaintiffs consented to Hobi’s requested extension of time to file its response to the Complaint and the requested adjournment of the April 10 Initial Pretrial Conference.

Should your Honor have any questions or concerns, please do not hesitate to contact the undersigned counsel for Hobi.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Joseph Farco".

Joseph Farco
Norris McLaughlin, P.A.

*Counsel for Jinjiang HobiBear Shoes &
Clothing Co., Ltd.*

CC: All counsel of record (*via ECF*)